

RECEIVED

JUL 19 2021

AT 8:30
WILLIAM T. WALSH
CLERK

COUNT II

Federal Tort Claims Act – Wrongful Death

6. Ravi Sood, MD owed a duty to Mr. Brinkley, breached his duty to him, and, as such, was a direct and proximate cause and a substantial factor in bringing about Mr. Brinkley's suffering and untimely death and his heir's damages outlined above.
7. Clinical Director Rolando Newman and members of the "URC" owed a duty to Mr. Brinkley, breached their duty to him, and, as such, were a direct and proximate cause and a substantial factor in bringing about Mr. Brinkley's suffering and untimely death and his heir's damages outlined above.

The actions of Ravi Sood, MD and Rolando Newman constitute the tort of negligence under the laws of the state of New Jersey.

8. Under the Federal Tort Claims Act, defendant United States of America is liable for these action

Wherefore, Plaintiff demand upon Defendant United States of America compensatory damages and any additional remedies this Court deems just.

Respectfully Submitted,

